

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.
v.	*	SECTION: "B" (1)
ABDUL RAHMAN KHAN	*	
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**FACTUAL BASIS**

If this matter had proceeded to trial, the government would have proven, through the introduction of competent testimony and admissible tangible exhibits, the following facts beyond a reasonable doubt to support the allegations in the Bill of Information now pending against the Defendant.

Between December 15, 2006 and July 25, 2008, in the Eastern District of Louisiana, the defendant, ABDUL RAHMAN KHAN ("KHAN"), illegally harbored a total of five aliens, namely, M.A., A.D., F.S., J.P., and D.O. These aliens had come to the United States illegally and remained in the United States in violation of Federal law. KHAN, knowing that these individuals were illegally present within the United States, concealed, harbored and shielded them from detection at

various locations including 7501 W. Judge Perez Drive and 100 Ocelot Drive, located in Arabi, Louisiana.

On December 7, 2007, KHAN and a CW discussed allowing illegal aliens to stay in the school controlled by the Defendant. KHAN allowed the illegal aliens to stay in the school. In addition, KHAN and the CW discussed a more permanent location for the illegal aliens to stay while working for the Defendant. The Defendant, through the CW, offered a FEMA trailer located on the lot at 7501 West Judge Perez Drive, Arabi, Louisiana to the illegal aliens in exchange for \$400.00 a month to pay for the rent of the lot and utilities. At the time, D.O. was staying at 7501 West Judge Perez Drive and moved to allow M.A., A.D., and J.P. to reside at the FEMA trailer at 7501 West Judge Perez Drive as they were working at that location. F. S. also resided at 7501 West Judge Perez Drive and later moved to 100 Ocelot Drive, Arabi, Louisiana.

On December 21, 2007, KHAN accepted the first \$400 cash payment for the rent of the lot and utilities from CW for the following illegal aliens: M.A., A.D., and J.P. and told the CW to connect the electricity to the neighboring site of an old gas station which was controlled by the Defendant.

On February 1, 2008, KHAN accepted a \$400.00 cash payment for the rent of the lot and utilities for permitting the aliens to use 7501 West Judge Perez Drive in Arabi, Louisiana. KHAN stated to the CW that he was working on finding another location to house these individuals.

On March 18, 2008, at 7517 West Judge Perez Drive, Arabi, Louisiana, KHAN accepted a \$400.00 cash payment for the rent of the lot and utilities for the aliens residing in a FEMA trailer parked at 7501 West Judge Perez Drive, Arabi, Louisiana. KHAN signed a receipt provided by the CW for the \$400.00.

On May 9, 2008, at 7517 West Judge Perez Drive, Arabi, Louisiana, KHAN accepted a cash payment of \$800.00 for the rent of the lot and utilities for the aliens residing in a FEMA trailer parked at 7501 West Judge Perez Drive, Arabi, Louisiana. KHAN signed a receipt provided by the CW for the \$800.00 received for three illegal aliens named M.A., A.D., and J. P.

On June 26, 2008, KHAN met the CW at 5201 North Claiborne Avenue, New Orleans and accepted a \$400.00 cash payment from the CW for the rent of the lot and utilities for 7501 West Judge Perez Drive, Arabi, Louisiana, for three aliens named M.A., A.D., and J. P. KHAN handwrote on the receipt that he provided permission for F.S. and J.P. to reside in the garage at 100 Ocelot Drive in Arabi, Louisiana.

KHAN admits that he charged these aliens rent for the land and for utilities to stay on the property located at 7501 West Judge Perez and 100 Ocelot Drive and did so having full knowledge that these aliens were not lawfully admitted nor permitted to work within the United States of America. This conduct facilitated the aliens remaining in the United States of America illegally as they had a physical location to remain and evade detection by immigration authorities.

READ AND APPROVED:

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MICHAEL W. MAGNER  
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Louisiana Bar Roll No. 1206

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Date

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Assistant United States Attorney  
Louisiana Bar Roll No. 25755

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Date

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ABDUL RAHMAN KHAN  
Defendant

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Date

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RICHARD W. WESTLING  
Attorney for Defendant

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Date